

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Price Cap Performance Review for Local)	CC Docket No. 94-1
Exchange Carriers)	
)	
Access Charge Reform)	CC Docket No. 96-262

**COMMENTS OF U S WEST, INC.
ON PETITIONS FOR RECONSIDERATION**

U S WEST, Inc. ("U S WEST") hereby submits these Comments on the petitions for reconsideration filed herein by AT&T Corp. ("AT&T") and the Ad Hoc Telecommunications Users Committee ("Ad Hoc").¹

**I. THE COMMISSION CORRECTLY DETERMINED TO RELY ON
TOTAL COMPANY PRODUCTIVITY DATA**

Rehashing arguments the Commission has already rejected, AT&T and Ad Hoc argue that the Commission erred by declining to prescribe an interstate-only productivity factor.² They raise nothing new and provide no reason for the Commission to change course on this issue.

The AT&T and Ad Hoc arguments boil down to one essential point, the contention that the local exchange carriers' ("LEC") interstate outputs exceed their intrastate outputs. Therefore, if the Commission does not calculate an interstate

¹ AT&T Petition for Partial Reconsideration and Ad Hoc Petition for Reconsideration were filed July 11, 1997 to the Federal Communications Commission's ("Commission") Fourth Report and Order. In the Matter of Price Cap Performance Review for Local Exchange Carriers, Access Charge Reform, CC Docket Nos. 94-1 and 96-262, Fourth Report and Order in CC Docket No. 94-1 and Second Report and Order in CC Docket No. 96-262, FCC 97-159, rel. May 21, 1997 ("Fourth Report and Order").

total factor productivity ("TFP"), it will understate LEC productivity. But as Dr. Laurits R. Christensen pointed out in a 1996 United States Telephone Association ("USTA") filing, "computing output is only half of the problem in TFP measurement."³ The other half of the problem is to develop a meaningful measure of interstate inputs. The difficulty in that lies in the fact that the same inputs go into both interstate and intrastate service. Any attempt to apportion those inputs between the jurisdictions will necessarily rely on some arbitrary allocation scheme.

Neither AT&T nor Ad Hoc provides a reasonable solution to this dilemma. Rather, they simply wish it away by assuming that interstate input growth equals total input growth. Dr. Christensen demonstrated the fallacy in this assumption, which produces economically meaningless results.⁴ Other parties concurred in this assessment that there is no economically meaningful way to separate inputs between the jurisdictions.⁵

Nothing in either Petition justifies a change in course on this issue. The Commission properly refused to utilize an interstate-only adjustment, and it should hold firm in that decision.⁶

² AT&T at 3-12; Ad Hoc at Attachment at 12-14.

³ Reply Comments of the United States Telephone Association on Fourth Further Notice of Proposed Rulemaking, filed Mar. 1, 1996 at Attachment A at 5.

⁴ Id. at 4-7.

⁵ The Commission's summary of comments in this proceeding cites no less than nine parties who advanced this position. Fourth Report and Order at Appendix B ¶ 60 and n.272.

⁶ Ad Hoc also complains about the Commission's decision to give the ETI study, submitted by Ad Hoc, no weight in determining the appropriate productivity factor. Ad Hoc at 1. The Commission properly summarized the numerous shortcomings of the ETI study (Fourth Report and Order ¶ 137) and properly concluded that it was

II. THE COMMISSION SHOULD NOT APPLY THE REVISED "X" FACTOR TO PCIs FOR THE 1995 ANNUAL PRICE CAP FILING

In the Fourth Report and Order, the Commission decided to apply its newly calculated productivity factor to the price cap LECs' Price Cap Indices ("PCI") as of July 1, 1996, to calculate their PCIs (and thus their rates) as of July 1, 1997.⁷

AT&T complains that the Commission should have applied the new productivity factor to the LECs' PCIs as of July 1, 1995, thus further reducing their July 1, 1997, rates.⁸ Having found that the productivity factor adopted in 1995 "understates LEC industry productivity growth,"⁹ and having concluded that it should not allow "all of the past two years of understated productivity to become permanently ingrained in LEC PCIs,"¹⁰ the Commission was required, says AT&T, to look all the way back to the PCIs as of July 1, 1995.

U S WEST does not agree that the Commission acted appropriately in "looking back" to 1996, and there is no good reason to enlarge that error. To be sure, in the 1995 LEC Price Cap Performance Review, the Commission required the price cap LECs to adjust their PCIs going back all the way to 1991.¹¹ That situation, however, differed considerably from this one. There, the Commission recalculated the results of one of the two studies it had relied on (the Frentrup-

unworthy of consideration. In any case, if the Commission reconsiders this decision, it must also reconsider its decision to give no weight to the far more probative Christensen study submitted by USTA.

⁷ Fourth Report and Order ¶ 179.

⁸ AT&T at 16-19.

⁹ Fourth Report and Order ¶ 178.

¹⁰ Id. ¶ 179.

Uretsky Study) by eliminating the results of that study for 1984, concluding that subsequent information indicated it had erred by including that data point in the analysis. The change had the result of increasing the productivity factor from 3.3 percent to 4.0 percent.¹²

In the instant proceeding, by contrast, the Commission relied on an entirely new study, “a synthesis of the most persuasive treatment of TFP suggested by the record.”¹³ This situation thus presents a much less compelling argument for “correcting” the prior years’ PCIs.

More important, AT&T’s argument would ascribe an unwarranted degree of precision to the process of selecting a productivity factor:

The ratemaking process . . . is “not an exact science.”¹⁴ Rather, it involves making predictive judgments about the future, and requires us to exercise our expertise and informed judgment in balancing the interests of consumers and shareholders.¹⁵

This balancing of interests is precisely what the Commission attempted to do in determining to “look back” only to 1996. Thus the Commission noted the “longer period of relative uncertainty” than it had intended when it adopted the interim factor.¹⁶

¹¹ Id. ¶ 177.

¹² In the Matter of Price Cap Performance Review for Local Exchange Carriers, First Report and Order, 10 FCC Rcd. 8961, 9053-54 ¶ 209 (1995) (“Local Price Cap Performance Review”).

¹³ Fourth Report and Order ¶ 137 and see Appendix D.

¹⁴ Local Price Cap Performance Review, 10 FCC Rcd. at 9055 ¶ 214, citing United States v. FCC, 707 F.2d 610 (D.C. Cir. 1983).

¹⁵ Id.

¹⁶ Fourth Report and Order ¶ 179.

The Commission might also have cited the changes that occurred during the interim period. In particular, the passage of the Telecommunications Act of 1996 and the attendant opening of LEC networks to interconnection, resale, and the provision of unbundled network elements, as well as the Commission's Access Charge Reform proceeding, threaten to reduce the revenues of the price cap LECs, quite apart from any action the Commission has taken with respect to price caps. Given the uncertainty created by these events, the Commission was well within its discretion in not ordering the "look back" to extend all the way to 1995.

III. THE COMMISSION CORRECTLY DETERMINED TO RETAIN THE LOW-END ADJUSTMENT

AT&T asks the Commission to reconsider its decision to retain the low-end adjustment.¹⁷ Though we had originally supported doing away with the low-end adjustment,¹⁸ U S WEST now believes the Commission correctly determined to retain that mechanism.

In this proceeding the Commission has determined to raise the productivity factor to 6.5 percent, much higher than it has ever been in the past. That factor was calculated on the basis of data for all seven Regional Bell Operating Companies ("RBOC") and thus does not represent the performance of any single LEC. Regardless of how the factor was calculated, or how well, no one can predict the performance of individual companies under this new regime: even if the productivity factor were correct for the industry as a whole, it might still be wildly

¹⁷ AT&T at 12-16.

¹⁸ Reply of U S WEST Communications, Inc., CC Docket No. 94-1, filed Mar. 1, 1996 at 34.

incorrect for some LECs. The low-end adjustment provides some protection for those LECs which cannot match the productivity required to attain adequate earnings under the new productivity factor.

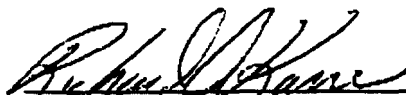
Moreover, the risk that some LECs will experience inadequate earnings has increased while this matter has been pending. The passage of the Telecommunications Act of 1996, the introduction of competitive interconnection, the availability of unbundled network elements, and the Commission's access charge reforms all add a considerable element of uncertainty to future LEC earnings, quite apart from the impact of the new productivity factor.

Given all these factors, U S WEST believes the Commission correctly determined to retain the low-end adjustment, and it should deny AT&T's request to reconsider that decision.

Respectfully submitted,

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August 18, 1997

CERTIFICATE OF SERVICE

I, Sherril Schalk, do hereby certify that on this 18th day of August 1997, I have caused a copy of the foregoing **COMMENTS OF U S WEST, INC. ON PETITIONS FOR RECONSIDERATION** to be served via first class United States Mail, postage pre-paid, upon the persons listed on the attached service list.


Sherril Schalk

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